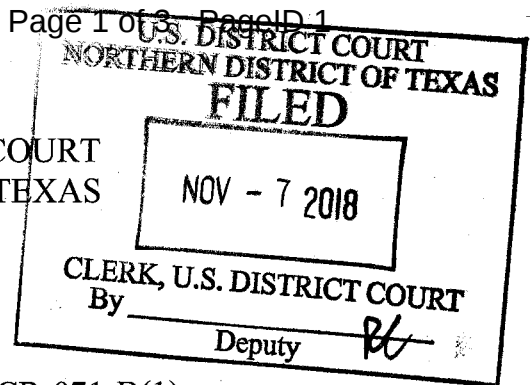


IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION



UNITED STATES OF AMERICA

v.

RICHARD JOHN MASSEY

NO. ~~1:18-CR-071-B(1)~~

3:18-cv-736 BL

**MOTION FOR DETENTION**

The United States moves for pre-trial detention of defendant, **RICHARD JOHN MASSEY**, pursuant to 18 U.S.C. § 3142.

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

- ☐ Crime of violence (18 U.S.C. §3156);
- ☐ Maximum sentence life imprisonment or death
- ☐ 10 + year drug offense
- ☐ Felony, with two prior convictions in above categories
- ☒ Serious risk defendant will flee
- ☐ Serious risk obstruction of justice
- ☒ Felony involving a minor victim
- ☐ Felony involving a firearm, destructive device, or any other dangerous weapon
- ☐ Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

  X   Defendant's appearance as required

  X   Safety of any other person and the community

3. Rebuttable Presumption. The United States will/will not invoke the rebuttable presumption against defendant because (check one or both):

       Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. §924(c)

       Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. §2332b(g)(5)

  X   Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§1201, 2251

       Previous conviction for "eligible" offense committed while on pretrial bond

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

       At first appearance

  X   After continuance of   2   days (not more than 3).

DATED this 7<sup>th</sup> day of November, 2018.

Respectfully submitted,

ERIN NEALY COX  
UNITED STATES ATTORNEY

/s/ Abe McGlothin, Jr.

ABE MCGLOTHIN, JR.  
Assistant United States Attorney  
Mississippi Bar No. 104247  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242  
Telephone: 214-659-8760  
Facsimile: 214-659-8800  
Email: [abe.mcglathin@usdoj.gov](mailto:abe.mcglathin@usdoj.gov)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing will be served on counsel for the defendant at the defendant's initial appearance in accordance with the Federal Rules of Criminal Procedure.

/s/ Abe McGlothin, Jr.

ABE MCGLOTHIN, JR.  
Assistant United States Attorney